

1 SAGEBRUSH LAW GROUP, PLLC
 2 Astrid A. Perez, Esq. (NSB 15977)
 3 PO Box 13744
 4 Reno, NV 89507
 5 Phone 775) 252-9639| Fax 775) 258-0624
 6 aperez@sagebrushlawgroup.com

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
 10 PAMELA BACHMANN, an individual,
 11 Plaintiff,

12 Case No.: 3:24-cv-00382-CSD

13 vs.

14 STATE OF NEVADA DEPARTMENT OF
 15 TRANSPORTATION, a public entity; JAMES
 16 WHALEN, an individual; DOES I through X.
 17 inclusive; and ROE COOPERATIONS I through
 18 X, inclusive,

19 **ORDER GRANTING
 20 STIPULATION TO WITHDRAW
 21 MOTION TO DISMISS AND STAY
 22 DISCOVERY**

23 Defendant.

24 Plaintiff PAMELA BACHMANN (hereinafter “Plaintiff”), by and through her counsel of
 25 record Astrid A. Perez, Esq of Sagebrush Law Group, PLLC, and Defendants STATE OF
 26 NEVADA DEPARTMENT OF TRANSPORTATION, and JAMES WHALEN, (collectively,
 27 “Defendants”), by and through its counsel of record AARON D. FORD, Attorney General for the
 28 State of Nevada, DANIEL R. HANSEN, Esq. Deputy Attorney General. of the Office of the
 Attorney General, hereby stipulate and submit to the Court for consideration the following
 STIPULATION TO WITHDRAW MOTION TO DISMISS AND STAY DISCOVERY.

On Thursday, March 6, 2025, the parties attended and participated in good faith the Early
 Neutral Evaluation. The parties were unable to reach a resolution, but have agreed to participate
 in a continued ENE, scheduled for April 10, 2025, at 9 a.m. In consideration of the continued ENE,
 the parties have agreed to withdraw the Motion to Dismiss pending before the Court and maintain

1 the stay of discovery. The parties agree that if the matter is not resolved at the continued ENE, the
 2 parties will refile the withdrawn Motion to Dismiss [ECF 8], Opposition to Motion to Dismiss
 3 [ECF 10], and Reply in Support of Motion to Dismiss [ECF 11]. The Motion to Dismiss will be
 4 filed within 7 days of the continued ENE. The Opposition to the Motion to Dismiss will be filed
 5 within 4 days of the refiled Motion to Dismiss. The Reply in Support of Motion to Dismiss will
 6 be filed within 4 days of the days of the refiled Opposition to the Motion to Dismiss. All refiled
 7 documents will be identical to the originally filed documents.

9 The stay of discovery will remain in effect until said decision has been made on the
 10 renewed Motion to Dismiss.

12
 13 Dated this 10th day of March, 2025

14 /s/ *Astrid A. Perez*

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Dated this 7th day of March, 2025

/s/ *Daniel R. Hansen*

DANIEL R. HANSEN
 Nevada Bar No. 14536
 Deputy Attorney General
*Attorney for Defendants, State of Nevada-
 Department of Transportation, James
 Whalen, an individual.*

21 **IT IS SO ORDERED:**

22 Dated this 10th of March, 2025.

23
 24 
 25 UNITED STATES MAGISTRATE JUDGE